

Title: Rubi et al. vs. The Provincial Board of Mindoro

Facts: The case revolves around the forced relocation and subsequent restriction of the movement of the Manguians, a group of indigenous people in the Province of Mindoro, Philippines. In an attempt to advance the status of the non-Christian tribes in Mindoro, the provincial board of Mindoro, on February 1, 1917, passed resolution No. 25, which directed the establishment of a reservation in the sitio of Tigbao on Naujan Lake for the permanent settlement of Mangyanes, a subgroup within the Manguians. This was done under the belief that previous attempts to civilize the Mangyanes had failed due to their dispersed living patterns and that concentrating them in a single settlement would make education and assimilation efforts more effective. The Secretary of Interior approved this resolution on February 21, 1917. Subsequently, on December 4, 1917, the provincial governor issued Executive Order No. 2, mandating that all Mangyans in certain vicinities should relocate to Tigbao by the end of 1917, with non-compliance punishable by imprisonment. Rubi and other Manguians sought relief through a habeas corpus petition, challenging their forced relocation and the legality of their detention for fleeing the reservation.

Issues:

1. Whether the forceful relocation of the Manguians to a reservation and their restriction therein constitute a deprivation of liberty without due process of law.
2. Whether the categorization of the Manguians as “non-Christians” and their subsequent treatment base on this classification amounts to discrimination and violates the equal protection clause of the Philippine Bill of Rights.
3. The validity and constitutionality of Sections 2145 and 2759 of the Administrative Code of 1917 concerning the treatment of non-Christian tribes.

Court’s Decision:

The Supreme Court, through Justice Malcolm, held that:

1. The relocation of the Manguians to a reservation did not constitute a deprivation of liberty without due process of law. The court found the action to be a valid exercise of the state’s police power, aimed at the advancement and welfare of the Manguians and not an arbitrary infringement on their liberties.
2. The classification of the Manguians as “non-Christians” for the purpose of their treatment under the law did not constitute unreasonable discrimination and did not violate the equal protection clause. The court considered the term “non-Christian” to refer not to religious belief but to a lack of civilization and thus saw the legislative action as aiming for the benefit of a specific less civilized group.

3. Sections 2145 and 2759 of the Administrative Code of 1917 were deemed constitutional as they were seen as necessary measures for the upliftment and eventual integration of the non-Christian tribes into the broader Filipino society.

**Doctrine:**

The Supreme Court's decision in *Rubi vs. The Provincial Board of Mindoro* established the doctrine that the state's police power could be exercised to restrict the liberties of indigenous peoples for their own welfare and the state's interest in their advancement. The decision emphasized the broad scope of state authority under police power, including the paternalistic intervention in the lives of indigenous communities deemed to be in need of civilization and integration into the national fabric.

**Class Notes:**

1. **Police Power:** The state's inherent authority to regulate behavior and enforce order within its territory for the betterment of the health, safety, morals, and general welfare of its inhabitants.
2. **Due Process of Law:** A constitutional guarantee that all legal proceedings will be fair and that one will be given notice of the proceeding and an opportunity to be heard before the government acts to take away one's life, liberty, or property.
3. **Equal Protection of the Laws:** A constitutional guarantee that no person or class of persons shall be denied the same protection of the laws that is enjoyed by other persons or other classes in like circumstances.
4. **Non-Christian Tribes:** The term, as used in this case and in the context of Philippine colonial legislation, refers not to religious belief but to indigenous peoples deemed to be of a lower level of civilization and in need of state intervention for their advancement.

**Historical Background:**

The case of *Rubi vs. The Provincial Board of Mindoro* presents a colonial perspective on the treatment of indigenous peoples under American sovereignty in the Philippines. It reflects the era's prevailing attitudes towards indigenous peoples as "wards" of the state needing guidance and civilization. This paternalistic approach underpins the legal and administrative measures taken by the colonial government to integrate indigenous communities into the larger colonial society, often at the expense of their traditional ways of life and liberties.